

# **EXHIBIT 15**

## Janitens, Erik

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**From:** Greeson, Robert  
**Sent:** Monday, July 9, 2018 12:35 PM  
**To:** 'William Ramey'  
**Cc:** Victoria Kubitskey; Cameron Bautsch; Janitens, Erik  
**Subject:** RE: WPEM v. SOTI

If a prior document (or any other publicly available system, etc.) demonstrates each accused product “element” you contend must be present to infringe a patent claim actually existed before the patent, the patent is necessarily invalid under section 102.

Either way – we will send you documents showing the accused product was publicly available before the asserted patent, which should end the case. I have already told you we found public sources, including the “way back” website, showing the accused product was publicly before the priority date of the asserted patent.

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**From:** William Ramey [mailto:[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)]  
**Sent:** Monday, July 9, 2018 12:29 PM  
**To:** Greeson, Robert <[robert.greeson@nortonrosefulbright.com](mailto:robert.greeson@nortonrosefulbright.com)>  
**Cc:** Victoria Kubitskey <[vkubitskey@rameyfirm.com](mailto:vkubitskey@rameyfirm.com)>; Cameron Bautsch <[Cbautsch@rameyfirm.com](mailto:Cbautsch@rameyfirm.com)>; Janitens, Erik <[erik.janitens@nortonrosefulbright.com](mailto:erik.janitens@nortonrosefulbright.com)>  
**Subject:** RE: WPEM v. SOTI  
**Importance:** High

Robert,

Also, we disagree with your premise. Accused products have elements, it would be those elements that infringe the patent. A product name and date of availability are not dispositive of any issues, as element, or technical features, are constantly updated.

Thanks,

Bill

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**From:** Greeson, Robert <[robert.greeson@nortonrosefulbright.com](mailto:robert.greeson@nortonrosefulbright.com)>  
**Sent:** Monday, July 09, 2018 12:07 PM  
**To:** William Ramey <[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>  
**Cc:** Victoria Kubitskey <[vkubitskey@rameyfirm.com](mailto:vkubitskey@rameyfirm.com)>; Cameron Bautsch <[Cbautsch@rameyfirm.com](mailto:Cbautsch@rameyfirm.com)>; Janitens, Erik <[erik.janitens@nortonrosefulbright.com](mailto:erik.janitens@nortonrosefulbright.com)>  
**Subject:** RE: WPEM v. SOTI

Ok.

To be more specific, whether the “January 2013 documents [] disclose [y]our patented claims” is an issue we might argue over (while SOTI does state they invalidate the claims), but the simpler issue is that the documents show, at a minimum, the accused product was publicly available before the priority date of the patent. So, to the extent you argue the accused product infringes, therefore, it necessarily invalidates the claims.

--rg

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**From:** William Ramey [<mailto:wramey@rameyfirm.com>]

**Sent:** Monday, July 9, 2018 12:05 PM

**To:** Greeson, Robert <[robert.greeson@nortonrosefulbright.com](mailto:robert.greeson@nortonrosefulbright.com)>

**Cc:** Victoria Kubitskey <[vkubitskey@rameyfirm.com](mailto:vkubitskey@rameyfirm.com)>; Cameron Bautsch <[Cbautsch@rameyfirm.com](mailto:Cbautsch@rameyfirm.com)>; Janitens, Erik <[erik.janitens@nortonrosefulbright.com](mailto:erik.janitens@nortonrosefulbright.com)>

**Subject:** RE: WPEM v. SOTI

Robert,

We are developing the facts on the SOTI and AT&T.

Thanks,

Bill

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**From:** Greeson, Robert <[robert.greeson@nortonrosefulbright.com](mailto:robert.greeson@nortonrosefulbright.com)>

**Sent:** Monday, July 09, 2018 12:02 PM

**To:** William Ramey <[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>

**Cc:** Victoria Kubitskey <[vkubitskey@rameyfirm.com](mailto:vkubitskey@rameyfirm.com)>; Cameron Bautsch <[Cbautsch@rameyfirm.com](mailto:Cbautsch@rameyfirm.com)>; Janitens, Erik <[erik.janitens@nortonrosefulbright.com](mailto:erik.janitens@nortonrosefulbright.com)>

**Subject:** RE: WPEM v. SOTI

Yes, we will send some exemplary document for your consideration under FRE 408.

Also, I recall you were going to look into the issue of prior disclosure to SOTI and/or ATT – what did you determine?

--Robert

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**From:** William Ramey [<mailto:wramey@rameyfirm.com>]

**Sent:** Monday, July 9, 2018 12:00 PM

**To:** Greeson, Robert <[robert.greeson@nortonrosefulbright.com](mailto:robert.greeson@nortonrosefulbright.com)>

**Cc:** Victoria Kubitskey <[vkubitskey@rameyfirm.com](mailto:vkubitskey@rameyfirm.com)>; Cameron Bautsch <[Cbautsch@rameyfirm.com](mailto:Cbautsch@rameyfirm.com)>

**Subject:** WPEM v. SOTI

**Importance:** High

Robert,

I was under the impression you were going to send some prior art documents? I believe you thought you had January 2013 documents that disclose our patented claims?

Thanks,

Bill

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